

**Before the
Federal Communications Commission
Washington, DC 20554**

In the Matter of)	GN Docket 20-110;
)	ITC-214-20020728-00361;
China Unicom (Americas) Operations Limited)	ITC-214-20020724-00427
)	

MOTION FOR EXTENSION OF TIME

China Unicom (Americas) Operations Limited (“CUA”), pursuant to 47 C.F.R. § 1.46, hereby moves for a brief extension of the time for its response to the Order to Show Cause,¹ issued April 24, 2020, for an additional 30 days, to June 23, 2020. In support of this Motion, CUA states as follows:

1. On April 24, 2020, the Chiefs of the Commission’s International Bureau, Wireline Competition Bureau, and Enforcement Bureau issued the Order, directing CUA to show cause why the Commission should not initiate a proceeding to revoke CUA’s domestic and international section 214 authorizations and to reclaim CUA’s International Signalling Point Codes (“ISPC”).²
2. The Order requires CUA to file a response with the Bureaus within 30 calendar days.³
3. The Order requires CUA’s response to address 16 specific items.⁴ Many of these requests seek detailed information and explanations, including a description of the extent to which CUA “is or is not otherwise subject to the exploitation, influence and control of the Chinese government.”⁵

¹ In the Matter of China Unicom (Americas) Operations Limited, GN Docket No. 20-110, ITC-214-20020728-00361, ITC-214-20020724-00427, Order to Show Cause, DA 20-449 (IB, WCB, EB rel. Apr. 24, 2020) (“Order”).

² *Id.* at ¶1.

³ *Id.* at ¶9. Pursuant to Section 1.4 of the FCC’s Rules, the response is due by May 26, 2020. See 47 C.F.R. § 1.4.

⁴ *Id.* at ¶9.

⁵ *Id.*

4. In addition, as the Commission surely appreciates, the authorizations and ISPCs that the Order placed in issue are of major significance to CUA's business. Myriad factual circumstances beyond the questions that the Commission asked are likely to be pertinent to these issues, and CUA expects to be able to present a complete defense of its authorizations beyond solely responding to those questions. As the Commission surely appreciates, the 30-day deadline is very short for a matter of such magnitude.
5. CUA is a California corporation with its principal place of business in Virginia. It is a wholly-owned subsidiary of China Unicom Global Limited, a Hong Kong entity, which in turn is a wholly-owned subsidiary of China Unicom (Hong Kong) Limited, a Hong Kong entity.⁶
6. Promptly upon its receipt of the Order, CUA started to identify responsive information and diligently formulate its responses. However, the information requested in paragraph 9 of the Order is broad in scope and detail. Its requests include, but are not limited to, detailed descriptions of CUA's ownership; control; corporate governance; employees and employees' history; and CUA's services and equipment. After identifying employees and persons within CUA's control that can provide the requested information, CUA and its counsel will then need sufficient time to review and analyze the information so that it may formulate complete answers to some of the specific requests in paragraph 9, particularly those that require CUA to provide a narrative response. For example, number 13 requests "an explanation as to why the Commission should not reclaim China Unicom Americas' ISPCs," and number 16 seeks information about whether CUA is "subject to the exploitation, influence and control of the Chinese government."⁷

⁶ *Id.* at ¶4.

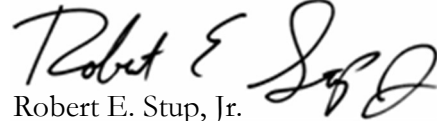
⁷ *Id.* at ¶9.

7. CUA must communicate with persons located in Hong Kong so that it may fully respond to the Order's requests. In addition to requiring time for translation of documents, and the time difference between Virginia and Hong Kong, the COVID-19 pandemic is affecting both northern Virginia and Hong Kong, which is making it difficult for CUA to provide a full and comprehensive response to the questions and issues raised by the Order within the 30-day deadline.
8. CUA will also need adequate time to review potentially responsive material for any relevant privileges, as well as to ensure that any protected and/or confidential information is treated appropriately so as not to compromise any sensitive business information, personal data, or other similarly confidential material.⁸
9. In particular, to prepare a full response, CUA is likely to need additional information from other parties, which it will work assiduously to gather but which is highly unlikely to be available before May 26, 2020.
10. CUA is committed to responding to the Order as swiftly as possible. An extension of time is necessary to allow it to gather and provide, to the extent possible, the information in the Order's specific requests, and prepare a thoughtful and detailed response demonstrating that the public convenience and necessity would be served by CUA's retention of the relevant authorizations and assignments. Without a full response enabled by an extension, the Commission will not have all the relevant information before it for the pending decision.
11. For the reasons stated above, CUA requests that the Commission grant the Motion and extend the time for CUA's response to June 23, 2020. While CUA favors a prompt resolution of the issues, it is also important that any Commission decisions be based on a full and complete record.

⁸ *Id.* at ¶10.

Thus, CUA respectfully requests that the Commission grant the Motion and extend the time for CUA's time to respond to the Order to June 23, 2020.

Respectfully submitted,

A handwritten signature in black ink, appearing to read "Robert E. Stup, Jr.", with a stylized flourish at the end.

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